

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE COVIDIEN PLC SECURITIES
LITIGATION

CASE NO. 1:14-CV-12949-LTS

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENT, CLASS CERTIFICATION, AND AWARD OF ATTORNEYS' FEES
AND EXPENSES**

PLEASE TAKE NOTICE that Lead Plaintiff Rosenfeld Family Foundation, supported by plaintiffs in the consolidated action, Joseph Lipovich and Richard Taxman (collectively, “Plaintiffs”), respectfully moves, on September 21, 2015 at 2:30 PM in Courtroom 13 before Judge Leo T. Sorokin, United States District Court for the District of Massachusetts, John Joseph Moakley U.S. Courthouse, 1 Courthouse Way, Boston, Massachusetts 02210, for an order: (i) granting final approval of the Settlement of the Consolidated Action, as embodied in the Stipulation; (ii) finally certifying a non-opt out class for settlement purpose and appointing class representative and class counsel; (iii) granting an award of reasonable attorneys’ fees and expenses to Plaintiffs’ Counsel. This unopposed motion is based on the accompanying memorandum of law, the Stipulation of Settlement and the accompanying exhibits attached therewith, the Declaration of Jason M. Leviton in Support of Lead Plaintiff’s Unopposed Motion for Final Approval of Settlement, Class Certification, and Award Of Attorneys’ Fees and Expenses and the accompanying exhibits attached therewith, as well as all prior proceedings held in this action, and other such matters and arguments as the Court may consider.

Respectfully submitted,

Dated: August 31, 2015

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By: /s/ Jason M. Leviton

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CERTIFICATE OF SERVICE

I hereby certify that this filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: August 31, 2015

/s/ Jason M. Leviton
Jason M. Leviton